

HEATHER E. WILLIAMS, SBN 122664
Federal Defender
CHRISTINA SINHA, SBN 278893
Assistant Federal Defender
Designated Counsel for Service
801 I Street, Third Floor
Sacramento, CA 95814
T: (916) 498-5700
F: (916) 498-5710

Attorneys for Defendant
HEIDI EDWARDS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:22-cr-00161-JAM
)
Plaintiff,) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
vs.)
)
JAMES MECHAM, KURT) Date: November 14, 2023
STOCKS, and HEIDI EDWARDS,) Time: 9:00 A.M.
) Judge: Hon. John A. Mendez
Defendants.)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Heiko Coppola, counsel for Plaintiff; Thomas A. Johnson, counsel of record for James Mecham; Malcolm S. Segal, counsel of record for Kurt Stocks; and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Heidi Edwards, that the status conference, currently set for November 14, 2023 can be continued to **February 13, 2024, at 9:00 a.m.**, and that time may be excluded as detailed below.

The above-named parties specifically stipulate as follows:

1. By previous order, the status conference as to all defendants in this matter was continued to November 14, 2023. ECF No. 45.
2. With the instant stipulation, all parties now seek to continue the status conference to February 13, 2024, and to exclude time under Local Code T-4 November 14,

2023 through February 13, 2024.

3. The legal framework in this case is very complex; defense counsel for all defendants represents that they require additional time to conduct legal research in this case, which involves the interplay of federal law, California law, and Arizona law; conduct defense investigations; research defenses; explore potential resolutions; and otherwise prepare for trial. Counsel believes that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

4. The government does not object to the continuance.

5. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial, and respectfully request the Court so to find. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time period between November 14, 2023 and February 13, 2024 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation, detailed above, in full as its Order.

The remainder of this page is intentionally blank. Signature blocks follow immediately.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 13, 2023

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
HEIDI EDWARDS

Date: November 13, 2023

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Defendant JAMES MECHAM

Date: November 13, 2023

/s/ Malcolm S. Segal
MALCOLM S. SEGAL
Attorney for Defendant KURT STOCKS

Date: November 13, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Heiko Coppola
HEIKO COPPOLA
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 13, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE